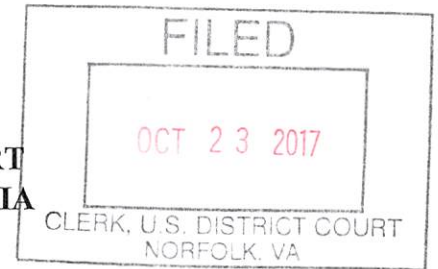


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**



IN RE: ) UNDER SEAL  
 )  
CRIMINAL COMPLAINT ) CASE NUMBER 4:17mj 182  
 )

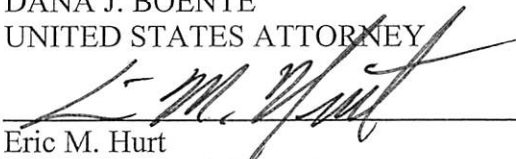
**MOTION TO SEAL CRIMINAL COMPLAINT**

The United States of America, by and through its attorneys, Dana J. Boente, United States Attorney for the Eastern District of Virginia, and Eric M. Hurt, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the criminal complaint, affidavit in support of the complaint and arrest warrant in this case.

Sealing is necessary to avoid notification of the existence of the arrest warrant which could result in flight from prosecution, the destruction of or tampering with evidence, the intimidation of potential witnesses, jeopardize the safety of the arresting officers or otherwise jeopardize the investigation. Another procedure will not adequately protect the needs of law enforcement at this time. Such sealing is within the discretion of this Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also, In re Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

The United States requests that the criminal complaint, affidavit in support of the complaint and arrest warrant remain under seal until the initial appearance of the defendant, at which time the criminal complaint and affidavit in support of the complaint may be treated as a matter of public record.

DANA J. BOENTE  
UNITED STATES ATTORNEY

  
Eric M. Hurt  
Assistant United States Attorney